

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

SEAN OWENS

Plaintiff

VS.

CEVA LOGISTICS, INC.

Defendant.

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CAUSE NO. 4:11 cv 2237

**PLAINTIFF'S RESPONSE TO DEFENDANT'S
FIRST INTERROGATORIES,
REQUEST FOR ADMISSION
and
REQUESTS FOR PRODUCTION**

TO: DEFENDANT, CEVA LOGISTICS, via counsel, Eleven Greenway Plaza, Suite 1400
Houston, Texas 77046.

Pursuant to the Federal Rules of Civil Procedure, Plaintiff, Sean V. Owens, by and through his Pro Se status, serves the following responses to the First Interrogatories, Request for Admission, and Requests for Production to the Defendant. All responses/answers are true to the best of my knowledge. The answers to the following Requests are being made in writing within the thirty (30) day requirement in accordance with the Federal Rules of Civil Procedure. Also, based on a mutual agreement opted by the Defendant, the documents are being served and presented via an electronic email source.

Respectfully submitted,

Sean V. Owens

Sean V. Owens
P.O. Box 21646
Houston, TX 77226
jaymatt7@hotmail.com



CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on February 25, 2012 via email correspondence to the following Defendant:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

Maricarmen Guzman Dollar, Attorney-in-charge for Defendant, CEVA Logistics, INC

State Bar No. 24002195

Eleven Greenway Plaza, Suite 1400

Houston, Texas 77046

Telephone: (713) 961-9045

Facsimile: (713) 961-5341

Sean V. Owens

Date: February 25, 2012

Sean V. Owens

P.O. Box 21646

Houston, TX 77226

jaymatt7@hotmail.com

DEFENDANT'S FIRST SET OF INTERROGATORIES TO PLAINTIFF

INTERROGATORY NO. 1:

Identify yourself or the person responding to these interrogatories on your behalf, by providing your complete name, address, telephone number, date of birth, and social security number.

RESPONSE:

Sean Owens, P.O. Box 21646, Houston, TX 77226, (214) 991-5672
xx-xx-1967
xxx-xx-7882

INTERROGATORY NO. 2:

Identify all arrests or convictions including the dates, offenses charged, whether a conviction resulted, and the city, county and state of all arrests and convictions.

RESPONSE:

No history of criminal arrests or convictions

INTERROGATORY NO. 3:

Identify all lawsuits or administrative proceedings to which you have been a party including case number; style; the court or agency where the case was or is pending; the nature of the case; whether you were a plaintiff, defendant, or another type of party; the final disposition of the case; and the name and address of your attorney for each such suit or proceeding.

RESPONSE:

- ❖ *OWENS v. CEVA LOGISTICS*; case no.: **4:11 cv 2237**
U.S. DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION
Labor - Fair Labor Standards Act overtime suit
Filed as Plaintiff; case is still pending; appearing Pro Se
- ❖ *OWENS v. CARRIER CORPORATION*; case no.: **2:08-cv-02331-SHM-tmp**
U.S. DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE
Labor - WARN Act violation, Class Action suit
Class Plaintiff Representative; case was settled on December 22, 2009
Gardner Law Firm, Mary E. Olsen, 210 S. Washington Ave., Mobile, AL 36602, (251) 433-8100
- ❖ *OWENS WAGE COMPLAINT AGAINST BAE SYSTEMS*; complaint no.: **2010-199-07264**
DEPARTMENT OF LABOR - WAGE & HOUR DIVISION, HOUSTON, TX
Labor - FLSA overtime violation
Filed as claimant; company settled claim in February, 2010
- ❖ *OWENS WAGE COMPLAINT AGAINST CARRIER CORPORATION*;
DEPARTMENT OF LABOR - WAGE & HOUR DIVISION, MEMPHIS, TN
Labor - FLSA overtime violation
Filed as claimant; company settled claim in April 2008


INTERROGATORY NO. 4:

State the names, addresses, and telephone numbers of all persons and entities for whom you have

VERIFICATION

STATE OF TEXAS §
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COUNTY OF HARRIS §

BEFORE ME, the undersigned Notary Public, on this day personally appeared SEAN OWENS who, being by me duly sworn on his oath deposed and said that he has read the foregoing Plaintiff's Response to Defendant's First Interrogatories and that the facts presented therein are within his personal knowledge and are true and correct.


SEAN OWENS

SWORN AND SUBSCRIBED to before me by SEAN OWENS on this the 1 day of
~~February~~ March, 2012.


NOTARY PUBLIC, STATE OF TEXAS

